No. 20-812

In the Supreme Court of the United States

LISA M. FOLAJTAR,

Petitioner,

v.

JEFFREY A. ROSEN, ACTING ATTORNEY GENERAL OF THE UNITED STATES; ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Mountain States Legal Foundation's Center to Keep and Bear Arms in Support of Petitioner contains 5,949 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 14, 2021.

<u>/s/ Cody J. Wisniewski</u> Cody J. Wisniewski *Counsel of Record* MOUNTAIN STATES LEGAL FOUNDATION 2596 South Lewis Way Lakewood, Colorado 80227 (303) 292-2021 cody@mslegal.org

Attorney for Amicus Curiae